

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BIGFOOT 4X4, INC.,)	
)	
)	Case No.: 22-cv-4220
Plaintiff,)	
)	
v.)	
)	Judge Rebecca R. Pallmeyer
THE INDIVIDUALS, CORPORATIONS,)	
LIMITED LIABILITY COMPANIES,)	
PARTNERSHIPS, AND UNINCORPORATED)	
ASSOCIATIONS IDENTIFIED ON)	
SCHEDULE A HERETO,)	
)	
)	
Defendants.)	

**PLAINTIFF’S *EX-PARTE* MOTION TO
EXTEND THE TEMPORARY RESTRAINING ORDER**

Pursuant to Federal Rule of Civil Procedure 65(b)(2), Plaintiff BIGFOOT 4X4, INC. seeks to extend the Temporary Restraining Order entered by the Court on August 15, 2022 [Dkt. 22, 23] (“the TRO”) which is set to expire on August 29, 2022, for a period of fourteen (14) days to and including September 12, 2022.

To date, Plaintiff has not received a copy of the sealed TRO. Plaintiff seeks to subpoena information concerning the identities of defendants from third parties including Aliexpress, Alipay, Amazon, PayPal and Context Logic, Inc. (“Wish”). Plaintiff respectfully requests the Court to extend the TRO to provide additional time for Plaintiff to receive the TRO and subpoena Aliexpress, Alipay, Amazon, PayPal and Wish to comply with the terms thereof.

Plaintiff submits that good cause exists for extending the TRO to prevent Defendants from transferring assets from their U.S.-based financial accounts, modifying the names of their

internet stores, or removing their internet stores from their current platform, among other things, as outlined in Plaintiff's Memorandum in Support of *Ex Parte* Motion for a Temporary Restraining Order [Dkt. 11]. This probability of harm is significant and continuing.

Wherefore, Plaintiff requests that the TRO be extended for a period of fourteen (14) days to and including September 12, 2022.

Respectfully submitted,

Dated: August 24, 2022

By: s/ Michael A. Hierl
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Attorneys for Plaintiff
BIGFOOT 4X4, INC.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Plaintiff's *Ex-Parte* Motion to Extend the Temporary Restraining Order was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on August 24, 2022.

s/Michael A. Hierl